

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KIMBRA CRISWELL,)	
)	
Plaintiff,)	
v.)	C.A. No. 05-CV-00321 GMS
)	
LYDIA ADAIR MCFADDEN and CHRISTIANA)	
CARE HEALTH SERVICES, INC.,)	JURY TRIAL DEMANDED
)	
Defendants.)	

NOTICE OF RECORDS DEPOSITION

PLEASE TAKE NOTICE that the undersigned attorney will take the records deposition of **Aureus Medical Group** on **August 15, 2006** beginning at 10:00 a.m. in the offices of **WHITE and WILLIAMS LLP**, 824 North Market Street, Suite 902, Wilmington, Delaware 19801.


Duces Tecum:

A complete copy of the entire employment file relating to Kimbra Criswell, including but not limited to application for employment, current job status, complete job description of all duties to be performed, yearly job performance/evaluation, attendance records, wage/salary information, employee benefit information, W-2 verification, any medical records, any claims or submission for Workers Compensation claims, any type of claims submitted for employee benefits, and complete description of all benefits.

Note: *Personal appearance has been waived if the requested records and affidavit of substitute compliance are received in this office prior to the date of the scheduled deposition.*

WHITE AND WILLIAMS LLP

By:

A handwritten signature in dark ink, appearing to read "Deborah J. Massaro", is written over a horizontal line.

DEBORAH MASSARO, ESQUIRE

824 Market Street, Suite 902

P.O. Box 709

Wilmington, DE 19899

(302) 654-0424

Attorney for Defendants,

Lydia Adair McFadden

and Christiana Care Health Services, Inc.

Date: August 1, 2006

CERTIFICATE OF SERVICE

I, Deborah Massaro, Esquire, certify that on this 1st day of August, 2006, two copies of the foregoing **NOTICES OF RECORDS DEPOSITION** were delivered by regular U.S. mail, postage prepaid, to the following individuals:

Daniel W. Scialpi, Esquire
Richard R. Wier, Jr., Esquire
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